

EXHIBIT 12

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

ALEXANDRIA DIVISION

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ROSY GIRON DE REYES;
JOSE DAGOBERTO REYES;
FELIX ALEXIS BOLANOS;
RUTH RIVAS; YOVANA JALDIN SOLIS;
ESTABAN RUBIN MOYA YRAPURA;
ROSE ELENA AMAYA, and
HERBERT SARAVIA CRUZ,

Plaintiffs,

CASE NO:

1:16ev00563-TCB

vs.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP; WAPLES PROJECT
LIMITED PARTNERSHIP; and
A. J. DWOSKIN & ASSOCIATES, INC.,

Defendants.

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DEPOSITION OF ALBERT DWOSKIN

Tysons Corner, Virginia

December 8, 2016

1:35 p.m.

Reported By:
Teague Gibson
Job No. 47896

1 the level of detail I get involved in.

2 Q So you don't know one way or another?

3 A That's correct.

4 Q Do you know one way or another whether
5 Yardi requires proof of legal status in the country
6 to run a background check?

7 A That's, again, that's not my -- I have not
8 been involved with Yardi on those issues. I have
9 not dealt with Yardi directly since the initial
10 contract was signed over five, six years ago.

11 Q So you don't know one way or another
12 whether they require it?

13 A I have not, literally, have not met or
14 talked with anybody from Yardi in five or six years.

15 Q Do you know of any other landlords who
16 require a Social Security number or proof of legal
17 status rent to a tenant?

18 MR. HANES: Objection. I did not understand
19 the question. Would you ask it again, please,
20 or read it back.

21 Q If you understood you can answer.

22 MR. HANES: I did not understand the question.
23 If I can't understand the question, I can't
24 object. Could you please read it back?

25 (Record was read)

1 A Yes.

2 Q Who?

3 A Everybody who has a federal housing
4 program, that's a requirement.

5 Q What do you mean by a federal housing
6 program?

7 A The subsidized housing.

8 Q Are you referring to Section 8?

9 A They have different programs for -- the
10 exact numbers I don't know, but I know from
11 everybody who's worked in them that they require
12 documentation that every resident is legally here.

13 Q Those are landlords that are part of
14 federal housing programs?

15 A I know that in those they're that and,
16 again, I don't talk with friends who are landlords
17 and say, gee, what are your rental criteria. I
18 would say that my experience in the housing business
19 is long-term owners of property are more likely than
20 not to require that residents be legal residents.

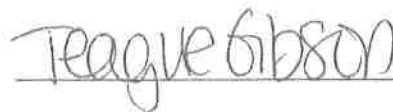
21 Q Is Waples part of the federal housing
22 program?

23 A We've had that question before, we really
24 did. And you know the answer to that.

25 Q I understood from our discussing

CERTIFICATE OF NOTARY PUBLIC

I, TEAGUE GIBSON, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotypy and thereafter reduced to typewriting under my direction; that reading and signing was not requested; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by and of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



Teague Gibson

My commission expires: February 14, 2019